

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

)	
ANGELA GONNEVILLE, individually)	CIVIL ACTION NO. 1:24-cv-11110
and on behalf of all others similarly)	
situated,)	
)	
Plaintiff)	
)	
v.)	
)	
LENS.COM, INC.)	
)	
Defendant)	
)	

UNOPPOSED MOTION TO FILE FIRST AMENDED CLASS ACTION COMPLAINT

Now comes the Plaintiff, Angela Gonneville, individually and on behalf of all others similarly situated, and files this motion to amend the Complaint to add a Chapter 93A claim and to conform the Complaint to the Federal Rules of Civil Procedure. As grounds, the Plaintiff states as follows:

1. The original Complaint was filed in the Business Litigation Session of Suffolk Superior Court and subsequently removed to this Court. The proposed amended complaint modifies the Complaint to conform to federal pleading standards.

2. Upon service of the Complaint, the Plaintiff also served a M.G.L. Chapter 93A consumer demand letter on the Defendant. More than thirty days have passed from the date of service and the Defendants have not served a written response on the Plaintiff as required under Chapter 93A.

3. The Plaintiff conferred with defense counsel regarding this motion to amend. The Defendant has indicated that it has no opposition to Plaintiff's motion to amend.

4. The First Amended Complaint is attached as Exhibit A.

On behalf of the Plaintiff and the
Putative Class,

/s/ Carlin J. Phillips

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